

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF
ILLINOIS

OUYEINC, LTD.,)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:20-cv-3490
)	
Dentalbest, et al.)	
)	
Defendants.)	Hon. Robert W. Gettleman

MOTION FOR EXTENSION OF TIME TO ANSWER
OR OTHERWISE PLEAD

COME NOW Defendants 2byoung2016, charmingbaistra, dentalbest, dentalbravo, dentaljoy, dentalsun, rammasun, topdentist, and usadental (hereinafter “Moving Defendants”), by and through counsel, and pursuant to Federal Rule of Civil Procedure 6(b) respectfully move this Court for an extension of time to answer or otherwise plead, showing the Court as follows:

1. Plaintiff filed its Complaint on June 15, 2020. [ECF No. 1]
2. An Amended Complaint was filed on June 16, 2020. [ECF No. 7]
3. According to the Certificate of Service filed by Plaintiff on November 18, 2020, the summons and complaint was served on October 2, 2020. [ECf No. 86].
4. On November 18, 2020, Plaintiff filed a motion for default that included the Moving Defendants. [ECF No. 87]
5. The undersigned was retained by the Moving Defendants on November 13, 2020. I immediately initiated settlement discussions with Plaintiff. Those discussions are ongoing. Moving Defendants would like to continue these good faith settlement negotiations. However, they need more time to do so.

6. The undersigned counsel sent an email to James Karamanis, counsel for Plaintiff, on the morning of November 24, 2020, seeking an agreement for an extension. As this matter is set for hearing this morning, Mr. Karamanis has not yet had an opportunity to respond.
7. Moving Defendants respectfully request that the Court enter an Order granting this motion and extending the deadline for it them answer or otherwise plead through December 8, 2020, to permit the parties to determine whether settlement is possible, or whether Moving Defendants will file a responsive pleading by that date.
8. This extension of time is not being sought for the purpose of delay or frustration of the progress of this matter.
9. This extension will not unduly burden Plaintiff.

WHEREFORE, Defendants 2byoung2016, charmingbaistra, dentalbest, dentalbravo, dentaljoy, dentalsun, rammasun, topdentist, and usadental respectfully request that this Court grant their Motion for Extension of Time to Answer or Otherwise Plead and Ordering them to answer or otherwise plead by December 8, 2020.

Respectfully submitted,

/s/ Erin K. Russell
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CERTIFICATE OF
SERVICE

This is to certify that on November 24, 2020, this document was filed with the Court via the CM/ECF electronic filing system, thereby serving it upon all counsel of record.

/s/ Erin K. Russell